



Special Master Hon. Thomas Vanaskie    Re: ZHP's August 31 Letter  
Stevens & Lee  
1500 Market Street  
East Tower, 18th Floor  
Philadelphia, PA 19103

September 1, 2023

Dear Judge Vanaskie,

Plaintiffs are in receipt of Mr. Bernardo's letter on behalf of the ZHP defendants and are confused about why he chose to send it now, given the previous email exchange. Plaintiffs are prepared to address this issue in the agenda letter that is due on September 8th, just as we plan to do on all outstanding discovery issues, in the ordinary course. Once the Court reviews the submissions and hears from the parties, the Court can determine whether any further briefing is required.

Sincerely,

Marlene Goldenberg

*Counsel for Plaintiffs*